

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)
Amendment of Part 97 of the Commission's Rules) Rule Making 11775
Governing the Amateur Radio Services) Report No. 3054

TO: The Commission

Reply Comments of Curtis "Curt" D. Sanders, K3URT
4707 Hillside Road • Harrisburg, PA 17109-5203 • 717-460-7713 • k3urt@mac.com

RE: RM-11775 "To amend the amateur radio rules to prohibit frequent changing of vanity call signs."

1. I, K3URT, am a proud holder of a vanity call sign for 21 years (previously N3TLJ).
2. I support the change of rules to prohibit *frequent* changing of call signs for the following reasons:
 - a. Vanity call signs are being frequently changed and abused for no constructive reason. It is agreed and codified that a licensed radio operator needs only one call sign to operate a radio station, therefore continuity is a good operation practice.
 - b. Frequent changes "...cause confusion in over-the-air station identification, to maintain accuracy in the licensee database."¹
 - c. Frequent call sign changes and applications hinder qualified operators from obtaining a new call sign. §97.19(2) makes the call sign unavailable for a two year period, in which the vicious cycle can begin again.
 - d. Frequent call sign changes are an inappropriate activity in the spirit of amateur radio. I know of no other amateur radio licensing authority that permits the frequent changing of operator call signs.
 - e. The establishment of the vanity call sign was done in the spirit of operators willing to pay a fee. "*A major concern of the amateur service community was that the vanity call sign system be fair and equitable. Specifically, many commentors [sic] suggested using a method of priority with respect to filing applications for vanity call signs.*"² It appears that the vanity call sign system has broken down to a whimsy.
3. Suggestions.
 - a. I support the change that would require an applicant to keep a call sign for the duration of its license, ten years,³ with the opportunity to change their call sign at the testing point of a new or upgraded class or perhaps once within the ten year license life.

1 Report and Order in PR Docket 93-305, 10 FCC Rcd 1039 (1995).

2 Report and Order, 10 FCC Rcd 1039 (1995).

3 § 97.25.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)
Amendment of Part 97 of the Commission's Rules) Rule Making 11775
Governing the Amateur Radio Services) Report No. 3054

b. Limit the number of vanity call sign applications a licensee may apply for within a specified time period and or license class.

c. As there are noted exceptions, the applicant for a vanity call sign must justify the request and be reviewed by the FCC for approval as codified in §97.27.

d. Reduce the two year waiting period to a lesser time. Eliminate or reduce “buyer’s remorse” on applied call signs to a more compressed time period.

e. Reinstate a fee for a vanity call sign.

Respectfully submitted,

/s/ Curtis “Curt” D. Sanders, K3URT
Harrisburg, Pennsylvania
1 November 2016